

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

GALLATIN RIVER COMMUNICATIONS )  
L.L.C. D/B/A CENTURYLINK )

Petition for Arbitration Pursuant to )  
Section 252(b) of the Communications Act )  
of 1934, as amended by the )  
Telecommunications Act of 1996 )  
To Establish the Rates, Terms and )  
Conditions of Interconnection with )  
NTS Services Corp. )

Docket No. \_\_\_\_\_

EXHIBIT C TO PETITION FOR ARBITRATION

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L.L.C. D/B/A CENTURYLINK

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**CENTURYLINK'S DISCOVERY REQUESTS TO NTS SERVICES CORP.**

Pursuant to 83 Ill. Adm. Code §200.360, Gallatin River Communications L.L.C. d/b/a CenturyLink requests that NTS Services Corp. respond to the following discovery requests within twenty eight (28) days.

**I. DEFINITIONS**

As used herein, the following terms have the meaning as set forth below:

1. "List," "describe," "detail," "explain," "provide," "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which you, your company or your agents or representatives have knowledge which is relevant to the answer called for by the request.

2. The terms “document,” “documents,” or “documentation” as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including, but not limited to: correspondence, letters, memoranda, internal communications, notes, reports, studies, surveys, books, manuals, work papers, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests.

3. The terms “identify” and “identity” when used with respect to any entity means to state the entity's full name and the address of its principal place of business.

4. The term “identify” with respect to a document means to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian.

5. The terms “relates to” or “relating to” mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing,

constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

6. The term “including” means “including, but not limited to.”

### **INSTRUCTIONS**

1. These data requests shall be deemed to be continuing. You are obligated to change, supplement, and correct all answers to data requests to conform to available information, including such information as first becomes available to you after the data requests hereto are filed and made, should additional information become known or should information supplied in the responses prove to be incorrect or incomplete.

2. The Response to each data request provided should first restate the question asked and also identify the person(s) supplying the information.

3. In answering these data requests, furnish all information that is available to you or may be reasonably ascertained by you, including information in the possession of any of your agents or attorneys, or otherwise subject to your knowledge, possession, custody or control.

### **DISCOVERY REQUESTS**

1. Produce the cost study or other cost-based pricing analysis that NTS used to make the claim that it does not believe a proper TELRIC study can support CenturyLink’s proposed Band 1 Loop 2W rate.

2. State in full NTS's basis for its position that CenturyLink's proposed Band 1 Loop 2W rate is too high.
3. Produce the cost study or other cost-based pricing analysis that NTS relies upon to support its proposed \$12.50 Band 1 Loop 2W rate.
4. If the answer to 3 above is none exists, state in full NTS's basis for proposing a \$12.50 Band 1 Loop 2W rate.
5. Produce the cost study or other cost-based pricing analysis that justifies a \$99.00 rate for DS-1 Loops in Band 1 in the CenturyLink franchise territory in Illinois.
6. If the answer to 5 above is none exists, state in full NTS's basis for proposing a \$99 DS-1 loop rate.

Respectfully submitted,

August 3, 2011



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Attorney for GALLATIN RIVER  
COMMUNICATIONS L.L.C. D/B/A  
CENTURYLINK

**CERTIFICATE OF SERVICE**

The undersigned attorney for Gallatin River Communications L.L.C. d/b/a CenturyLink hereby certifies that he caused copies of the attached CenturyLink's Discovery Requests to NTS Services Corp. to be served on each of the persons listed below in the manner indicated:

Mr. Kristopher E. Twomey  
Law office of Kristopher E. Twomey, P.C.  
1725 I Street, NW, Suite 300  
Washington, DC 20006  
[VIA FEDERAL EXPRESS DELIVERY ON August 3, 2011]

Mr. Dan Johnson  
NTS Services Corp  
205 Enterprise Dr.  
Pekin, Illinois 61554  
[VIA FEDERAL EXPRESS DELIVERY ON August 3, 2011]

  
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Thomas M. Dethlefs

Attorney for Gallatin River Communications L.L.C.  
d/b/a CenturyLink